

In The United States District Court of Delaware
Roland P. Anderson
VS,
General Motors
~
~
~ DC 110877

· motion to Dismiss His order for
A Deposition R. 30.1 / Also R. 26 - P. 37

Rule 30.1 STATES - for Reasonable notice for taking depositions
Unless otherwise ordered by the Court, "reasonable
Notices" for the TAKING of depositions under Fed.
R. Civ. P. 30(b) (1) shall be not LESS than five days.
EXA R. 30.1 attach.

Judge FARNAM order was on Aug. 16, 07. I received
A VIA - FedEx From Att. MICHAEL A. WILLIAMS
which states on Sept. 7, 2007.

AS SOON AS PRACTICAL we need to get
some dates for your deposition during the month
of Sept. to be TAKEN at the offices of our Local Counsel
in WIL. — see Letter attach & B. Att. MICHAEL A.
WILLIAMS mis the Deadline. Also he never notified the Court
R. 26

Cen. of Service
District Court of Del.
Michael A Williams Esq.

Thank you
Roland P. Anderson
113 Lloyd St.
WIL. DEL. 19804

IV. PARTIES.

Rule 23.1. Designation of "Class Action" in the caption.

In any case sought to be maintained as a class action, the complaint, or other pleading asserting a class action, shall include next to its caption, the legend "Class Action."

Source. — Model Local Rule 23.1.

V. DEPOSITIONS AND DISCOVERY.

Rule 26.1. Form of certain discovery papers and permissible number of requests.

(a) *Sequential numbering.* The parties shall number each interrogatory, request, answer, response, or objection sequentially, regardless of the number of sets of interrogatories or requests.

(b) *Permissible number of interrogatories, document requests, requests for admission and depositions.* Unless otherwise ordered by the Court, there shall be no limitation upon the permissible number of document requests, requests for admission, or depositions, but no party shall propound more than 50 interrogatories to any other party. Each subpart shall be counted as a separate interrogatory.

(c) *Form of responses.* The party answering, responding, or objecting to written interrogatories, requests for production of documents or things, or requests for admission served pursuant to Rules 33, 34 or 36 of the Federal Rules of Civil Procedure may state any general objections and then shall quote each such interrogatory or request in full immediately preceding the statement of any answer, response, or objection thereto.

Source. — Model Local Rule 26.1; former Delaware Local Rule 26.1 with revisions.

Rule 26.2. Confidentiality.

If any documents are deemed confidential by the producing party and the parties have not been able to agree on an appropriate protective order, until a protective order is in effect, disclosure should be limited to members and employees of the firm of trial counsel who have entered an appearance, and, where appropriate, have been admitted *pro hac vice*. Such persons are under an obligation to keep such documents confidential and to use them only for purposes of litigating the case.

Source. — Former Local Rule 26.2.

Rule 30.1. Reasonable notice for taking depositions.

Unless otherwise ordered by the Court, "reasonable notice" for the taking of depositions under Fed. R. Civ. P. 30 (b) (1) shall be not less than five days.

Source. — Former Delaware Local Rule 4.3A (first sentence).

Rule 30.2. Depositions. Pending resolution of the objecting party's motion to which the motion

Source. — Former Delaware Local Rule 4.3A (second and third sentences).

Rule 30.3. Who may take a deposition.

Unless otherwise ordered by the Court, a deposition may be taken by (1) the party, (2) an officer or employee of the party as its representative, (3) a person who is not a party, officer, or employee of the party, but who has been excluded while a deposition is being taken, or (4) an officer or employee of the party as its representative, who has been excluded while a deposition is being taken, or (5) a person who is not a party, officer, or employee of the party, but who has been excluded while a deposition is being taken.

Source. — Former Delaware Local Rule 4.1D.

Rule 30.4. Procedure for taking a deposition.

(a) *Beginning.* The deposition shall begin by the deponent giving an address, (2) the deponent stating the name and place of the witness, and (6) the officer before whom the deposition is taken, herself and the operator shall state the length of the deposition and the beginning of the deposition by the operator.

(b) *Timing.* The deposition shall be taken on camera which shall be the deposition of the deponent.

(c) *Custody.* The deposition shall be in the custody of and the operator shall permit the viewing of the deposition thereon.

(d) *Trial or deposition.* The deposition shall be excluded on the testimony of the deponent shall remain in the custody of the operator.

(e) *Objections.* The deposition shall be excluded on the testimony of the deponent shall remain in the custody of the operator.



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September 7, 2007

VIA FEDEX

Roland C. Anderson
113 Lloyd St.
Wilmington, DE 19804

Re: Anderson v. GM

Dear Mr. Anderson:

As soon as practical, we need to get some dates for your deposition during the month of September to be taken at the offices of our local counsel in Wilmington.

Thank you for your time and prompt attention to this matter. If we do not receive dates from you on or before September 14, 2007, we will have to proceed with noticing up the deposition.

Very truly yours,

LATHROP & GAGE L.C.

By: 

Michael A. Williams

:raf

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(7) The officer before whom the deposition is taken shall then identify himself or herself and swear the deponent on the record.

(b) Conclusion. At the conclusion of the deposition, the operator shall state on the record that the deposition is concluded. When the length of the deposition requires the use of more than one electronic file or recorded media, the end of each file or recorded media and the beginning of each succeeding file or recorded media shall be announced on the record by the operator.

(c) Timing by Digital Clock. The deposition shall be timed by a digital clock on the record which shall record and show continually each hour, minute and second of the deposition.

(d) Custody. Counsel for the party taking the deposition shall take custody of and be responsible for the safeguarding of the recorded media. The custodian shall permit the viewing of the electronic file or recorded media, and shall provide a copy of such upon the request and at the cost of a party.

RULE 30.5. Original Deposition Transcripts.

It shall be the duty of the party on whose behalf the deposition was taken to make certain that the officer before whom it was taken has delivered the original transcript to such party.

RULE 30.6. Depositions Upon Oral Examination.

From the commencement until the conclusion of deposition questioning by an opposing party, including any recesses or continuances, counsel for the deponent shall not consult or confer with the deponent regarding the substance of the testimony already given or anticipated to be given, except for the purpose of conferring on whether to assert a privilege against testifying or on how to comply with a court order.

RULE 37.1. Discovery Motions to Include the Discovery at Issue.

Any discovery motion filed pursuant to Fed. R. Civ. P. 26 through 37 shall include, in the motion itself or in a memorandum, a verbatim recitation of each interrogatory, request, answer, response, or objection which is the subject of the motion or shall have attached a copy of the actual discovery document which is the subject of the motion. L ✓

VI. TRIALS

RULE 38.1. Notation of "Jury Demand" on the Pleading.

Roland E. Anderson
113 Lloyd St.
W.D. Del. 19804



The Honorable Joseph J. Parrino
United States District Court for the District
of Delaware
844 N. King Street, Em 4209
Room Box 27
W.D. Del. 19801



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